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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**Ag Producer Services, Cargill, Inc.
Uniontown Road
Mt. Vernon, Indiana 47620**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F129-12502-00001	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 20, 2001 Expiration Date: December 20, 2006

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wholesale grain processing operation.

Authorized individual:	Terry Ham
Source Address:	Uniontown Road, Mt. Vernon, Indiana 47620
Mailing Address:	P.O. Box 747, Mt. Vernon, Indiana 47620
SIC Code:	5153
Source Location Status:	Posey
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Three (3) grain elevator systems, identified as emission units ID 1, 2, and 3, with a maximum total rate of forty (40) million bushels of grain per year, using a Dacron baghouse each for control, exhausting through three (3) stacks; identified as S-1, S-2, and S-3. The three systems are:
 - (1) System 1, using a Dacron baghouse, identified as DS-1, for particulate control, exhausting through a stack, identified as S-1, consists of the following emission units:
 - (A) One (1) truck receiving area, identified as Truck Dump #1, with a maximum hourly capacity of 17,500 bushels per hour;
 - (B) One (1) truck receiving area identified as Truck Dump #2, with a maximum hourly capacity of 17,500 bushels per hour;
 - (C) Grain handling from Bin 12 Upper to Grain Scale, with a maximum hourly capacity of 40,000 bushels per hour; and
 - (D) Grain handling from Grain Scale to Hawk Belt, with a maximum hourly capacity of 40,000 bushels per hour;
 - (2) System 2, using a Dacron baghouse, identified as DS-2 for particulate control, exhausting through a stack, identified as S-2, consists of the following emission units:
 - (A) Grain handling from Drag Conveyor DC-1 to Leg 1, with a maximum hourly capacity of 20,000 bushels per hour;

- (B) Grain handling from Drag Conveyor DC-2 to Leg 2 with a maximum hourly capacity of 20,000 bushels per hour;
 - (C) Grain handling from Rail DC to Legs 3 and 4, with a maximum hourly capacity of 17,500 bushels per hour;
 - (D) Grain handling from Bins to Reclaim Conveyors and Spouts, with a maximum hourly capacity of 17,500 bushels per hour; and
 - (E) Grain handling from Reclaim Conveyors to Grain Legs, with a maximum hourly capacity of 17,500 bushels per hour;
- (3) System 3, using a Dacron baghouse, identified as DS-3, for particulate control, exhausting through a stack identified as S-3, consists of the following emission units:
- (A) Grain handling from Grain Legs to Dual Distributor, with a maximum hourly capacity of 17,500 bushels per hour;
 - (B) Grain handling from Dual Distributor to Tripper or Spouts, with a maximum hourly capacity of 17,500 bushels per hour;
 - (C) Grain handling from Tripper or Spouts to Bins, with a maximum hourly capacity of 17,500 bushels per hour;
 - (D) Grain handling from Legs 3 and 4 to Rail Tank, with a maximum hourly capacity of 17,500 bushels per hour;
 - (E) Grain handling from Rail Shed loadout, with a maximum hourly capacity of 17, 500 bushels per hour; and
 - (F) Grain handling from Grain Legs to Dryers, with a maximum hourly capacity of 17, 500 bushels per hour;
- (b) Four (4) fugitive emission points from the Truck Dump, Rail Dump, Rail Loadout, and Barge Loadout, identified as FS-1, FS-2, FS-3, and FS-4, respectively.
- (c) Two (2) grain dryers, identified as emission unit ID 4 and 5, one with a maximum capacity of 4,000 bushels per hour and the other with a maximum capacity of 3,000 bushels per hour, heated by natural gas, with a heat input rate of thirty six (36) million Btu (MMBtu) per hour, exhausting through one (1) stack each, identified as S-4 and S-5, respectively.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
- (b) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;
- (c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;

- (d) Paved and unpaved roads and parking lots with public access;
- (e) Underground conveyors;
- (f) On-site fire and emergency response training approved by the department; and
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the

“authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than or July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit [326 IAC 2-8-4(5)(C)]. The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty

(30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;

- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit

responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will

adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.17 Compliance Response Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this

permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.19 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is

submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Three (3) grain elevator systems, identified as emission units ID 1, 2, and 3, with a maximum total rate of forty (40) million bushels of grain per year, using a Dacron baghouse each for control, exhausting through three (3) stacks; identified as S-1, S-2, and S-3. The three systems are:
 - (1) System 1, using a Dacron baghouse, identified as DS-1, for particulate control, exhausting through a stack, identified as S-1, consists of the following emission units:
 - (A) One (1) truck receiving area, identified as Truck Dump #1, with a maximum hourly capacity of 17,500 bushels per hour;
 - (B) One (1) truck receiving area identified as Truck Dump #2, with a maximum hourly capacity of 17,500 bushels per hour;
 - (C) Grain handling from Bin 12 Upper to Grain Scale, with a maximum hourly capacity of 40,000 bushels per hour; and
 - (D) Grain handling from Grain Scale to Hawk Belt, with a maximum hourly capacity of 40,000 bushels per hour;
 - (2) System 2, using a Dacron baghouse, identified as DS-2 for particulate control, exhausting through a stack, identified as S-2, consists of the following emission units:
 - (A) Grain handling from Drag Conveyor DC-1 to Leg 1, with a maximum hourly capacity of 20,000 bushels per hour;
 - (B) Grain handling from Drag Conveyor DC-2 to Leg 2 with a maximum hourly capacity of 20,000 bushels per hour;
 - (C) Grain handling from Rail DC to Legs 3 and 4, with a maximum hourly capacity of 17,500 bushels per hour;
 - (D) Grain handling from Bins to Reclaim Conveyors and Spouts, with a maximum hourly capacity of 17,500 bushels per hour; and
 - (E) Grain handling from Reclaim Conveyors to Grain Legs, with a maximum hourly capacity of 17,500 bushels per hour;
 - (3) System 3, using a Dacron baghouse, identified as DS-3, for particulate control, exhausting through a stack identified as S-3, consists of the following emission units:
 - (A) Grain handling from Grain Legs to Dual Distributor, with a maximum hourly capacity of 17,500 bushels per hour;
 - (B) Grain handling from Dual Distributor to Tripper or Spouts, with a maximum hourly capacity of 17,500 bushels per hour;
 - (C) Grain handling from Tripper or Spouts to Bins, with a maximum hourly capacity of 17,500 bushels per hour;
 - (D) Grain handling from Legs 3 and 4 to Rail Tank, with a maximum hourly

Facility Description [326 IAC 2-8-4(10)]:

capacity of 17,500 bushels per hour;

(E) Grain handling from Rail Shed loadout, with a maximum hourly capacity of 17,500 bushels per hour; and

(F) Grain handling from Grain Legs to Dryers, with a maximum hourly capacity of 17,500 bushels per hour;

(b) Four (4) fugitive emission points from the Truck Dump, Rail Dump, Rail Loadout, and Barge Loadout, identified as FS-1, FS-2, FS-3, and FS-4, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions from the equipment listed above shall not exceed the pound per hour emission rate reported below:

Process/Facility	Process Weight Rate (bushels/hr)	Process Weight Rate (ton/hr)	Emission Rate (lb/hr)
Group 001 Processes			
Truck Dump #1	17,500	525	69.54
Truck Dump #2	17,500	525	69.54
Bin 12 Upper to Grain Scale	40,000	1,200	79.97
Grain Scale to Hawk Belt	40,000	1,200	79.97
Group 002 Processes			
DC1 to Leg1	20,000	600	71.16
DC2 to Leg 2	20,000	600	71.16
Rail DC to Legs 3 and 4	17,500	525	69.54
Bins to Reclaim Conveyors and Spouts	17,500	525	69.54
Reclaim Conveyors to Grain Legs	17,500	525	69.54
Group 003 Processes			
Grain Legs to Dual Distributor	17,500	525	69.54
Dual Distributor to Tripper	17,500	525	69.54
Tripper or Spouts to Bins	17,500	525	69.54
Legs 3 and 4 to Rail Tank	17,500	525	69.54
Rail Shed Loadout	17,500	525	69.54
Grain Legs to Dryers	17,500	525	69.54

These limits were calculated using the following equations:
Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 Particulate Emissions Limit [326 IAC 2-2][40 CFR 52.21] [326 IAC 2-8]

- (a) The grain elevators shall be limited to forty million (40,000,000) bushels of grain per 12 consecutive month period. This is the same limit as Condition D.2.2. The source shall be limited to PM emissions of 0.035 pounds per ton of grain for receiving units, 0.061 pounds per ton of grain for shipping, handling, and loadout units, 0.27 pound per ton of grain for the rail shed loadout, and 0.2 pounds per ton of grain for the drying units. These limitations are equivalent to limiting PM emissions to less than two hundred fifty (250) tons per year. Compliance with these limits and the use of the baghouses make 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, not applicable.
- (b) The grain elevators shall be limited to forty million (40,000,000) bushels of grain per 12 consecutive month period. This is the same limit as Condition D.2.2. The source shall be limited to PM10 emissions of 0.0078 pounds per ton of grain for receiving units, 0.055 pounds per ton of grain for drying units, and 0.0022 pounds per ton of grain for shipping units. These limitations are equivalent to limiting PM10 emissions to less than one hundred (100) tons per year. Compliance with the limits and the use of baghouses make 326 IAC 2-7 (Part 70 Permit program) not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

In order to comply with D.1.1 and D.1.2 the baghouses shall be in operation at all times that the facilities mentioned above are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of each stack exhaust shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take

response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the process mentioned above, at least once per shift when the processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the normal range of 2.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the processes mentioned above when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2 the permittee shall maintain records of the bushels of grain processed. This is the same record that is required in Condition D.2.5.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the stack exhaust once per shift.

- (c) To document compliance with Condition D.1.6, the Permittee shall maintain the following:
 - (1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle operation.
 - (2) Documentation of the dates vents are redirected.
- (d) To document compliance with D.1.7, the permittee shall maintain records of the results of the inspections required.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (c) Two (2) grain dryers, identified as emission unit ID 4 and 5, one with a maximum capacity of 4,000 bushels per hour and the other with a capacity of 3,000 bushels per hour, heated by natural gas, with a heat input rate of thirty six (36) million Btu (MMBtu) per hour, exhausting through one (1) stack each, identified as S-4 and S-5, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions from the equipment listed above shall not exceed the pound per hour emission rate reported below:

Process/Facility	Process Weight Rate (bushels/hr)	Process Weight Rate (ton/hr)	Emission Rate (lb/hr)
Dryers			
Meyer Dryer	4,000	120	53.13
Berico Dryer	3,000	90	50.23

These limitations were based on the equation below:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Particulate Emissions Unit [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-8]

- (a) The grain elevators shall be limited to forty million (40,000,000) bushels of grain dried per 12-month period. This is the same limit as Condition D.1.9. This limit is required to limit the potential to emit of particulate matter to below 250 tons per year. Compliance with this limit and the use of the baghouses makes 326 IAC 2-2 and 40 CFR 52.21, not applicable.
- (b) The source shall limit PM10 emissions to less than 100 tons per year which will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. This is the same limit as Condition D.1.9. The source will be in compliance with this limitation by limiting the grain elevators to forty million (40,000,000) bushels of grain per twelve (12) consecutive month period and by using the baghouses.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.4 Visible Emissions Notations

- (a) Visible emission notations of the grain dryer stacks exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the permittee shall maintain records of the bushels of grain processed. This is the same record as required in Condition D.1.9.
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain records of visible emission notations of the grain dryer stacks exhaust once per shift.
- (c) To document compliance with Condition D.2.2, the permittee shall maintain records of the bushels of grain processed.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, with thirty (30) days after the end of the quarter being reported. The report submitted by the permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Ag Producer Services, Cargill, Inc.
Source Address: Uniontown Road, Mt. Vernon, Indiana 47620
Mailing Address: P.O. Box 747, Mt. Vernon, Indiana 47620
FESOP No.: F129-12502-00001

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify)
- 9 Report (specify)
- 9 Notification (specify)
- 9 Affidavit (specify)
- 9 Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone Number:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Ag Producer Services, Cargill, Inc.
Source Address: Uniontown Road, Mt. Vernon, Indiana 47620
Mailing Address: P.O. Box 747, Mt. Vernon, Indiana 47620
FESOP No.: F129-12502-00001

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p>9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16</p> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Ag Producer Services, Cargill, Inc.
Source Address: Uniontown Road, Mt. Vernon, Indiana 47620
Mailing Address: P.O. Box 747, Mt. Vernon, Indiana 47620
FESOP No.: F129-12502-00001
Facility: Grain Elevators 1-3, Grain Dryers
Parameter: Bushels of grain processed
Limit: 40,000,000 Bushels per 12 consecutive months

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Ag Producer Services, Cargill, Inc.
Source Address: Uniontown Road, Mt. Vernon, Indiana 47620
Mailing Address: P.O. Box 747, Mt. Vernon, Indiana 47620
FESOP No.: F129-12502-00001

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

December 20, 2001

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the Permit for Federally Enforceable State Operating Permit
(FESOP)**

Source Background and Description

Source Name:	Ag Producer Services, Cargill, Inc.
Source Location:	Uniontown Road, Mount Vernon, Indiana 47620
County:	Posey
SIC Code:	5153
Operation Permit No.:	129-12502-00001
Permit Reviewer:	ERG/KC

On November 7, 2001, the Office of Air Quality (OAQ) had a notice published in the Mount Vernon Democrat, Mount Vernon, Indiana, stating that Ag Producer Services, Cargill, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a wholesale grain processing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Upon the request of EPA, condition B.15 has been revised as follows to clarify the language about deviation reporting.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do does not~~ need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~
- (1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
- (2) ~~Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.
2. Several conditions were modified by removing language stating that the condition was not federally enforceable. Federal law states that failure to comply with any permit condition issued under a program that has been approved into a State Implementation Plan (SIP) is to be treated as a violation of the SIP (40 CFR 52.23). This has the effect of making all FESOP conditions federally enforceable. Indiana's FESOP program was approved as a part of Indiana's SIP at 40 CFR 52.788. Neither the program nor the underlying rule, 326 IAC 2-8 contains provisions for designating certain conditions as not federally enforceable; therefore, IDEM, OAQ has made the changes to the following conditions:

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.~~

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. ~~The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.~~

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work

or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
 - (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.
3. Upon the request of EPA, condition C.17 has been revised because IDEM does not have the authority through FESOP to create an exemption from reporting failures.

C.17 **Compliance Monitoring Response Plan - Failure to Take Response Steps** [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to ~~prepare~~ **implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements.** The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the

~~compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

- ~~(1) This condition;~~
- ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
- ~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~
- ~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
- (5) **A a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, and maintained on site, and is comprised of:**

~~(A)(1)~~ Reasonable response steps that may be implemented in the event that ~~compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and~~ **an expected time frame for taking reasonable response steps.**

~~(B)~~ ~~A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~

- (1) **Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**
- (2) **If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**
- (3) **If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with**

respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The Permittee is excused from taking not required to take any** further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment **and This shall be an excuse from taking further response steps** providing that prompt action was taken to correct the monitoring equipment.
- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

~~(d)(e)~~ Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

~~(e)(f)~~ **Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.** If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) ~~At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

4. Upon the request of EPA, the notification sent in response to non-compliance with a stack test now requires a certification by the authorized individual. Therefore, condition C.18 has been revised as following:

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

5. Condition C.21 has been revised to indicate that the Quarterly Deviation and Compliance Monitoring Report should be submitted to the Compliance Data Section and not to the Compliance Data Branch as indicated in the draft permit.

C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data ~~Branch~~ **Section**, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

6. Condition D.1.5, Condition D.1.8, and Condition D.2.4 has been revised to say Compliance Response Plan and not Compliance Monitoring Plan as indicated in the draft permit.

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of each stack exhaust shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.2.4 Visible Emissions Notations

- (a) Visible emission notations of the grain dryer stacks exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response Plan - Failure to Take Response Steps**, shall be considered a violation of this permit.
7. Upon the request of EPA, parametric monitoring condition (condition D.1.6) has been revised to clarify that the facility specific events would not qualify as a deviation.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the processes mentioned above, at least once per shift when the processes are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within~~ **When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 10.0 inches of water or a range established during the latest stack test. The Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Failure to Take Response Steps.** ~~for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **A pressure reading that is outside the above mentioned range is not a deviation from this permit.** Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response Plan - Failure to Take Response Steps**, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name: Ag Producer Services, Cargill, Inc.
Source Location: Uniontown Road, Mt. Vernon, Indiana 47620
County: Posey
SIC Code: 5153
Operation Permit No.: F 129-12502-00001
Permit Reviewer: ERG/KC

The Office of Air Quality (OAQ) has reviewed a FESOP application from Ag Producer Services, Cargill, Inc., relating to the operation of wholesale grain processing.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Three (3) grain elevator systems, identified as emission units ID 1, 2, and 3, with a maximum total rate of forty (40) million bushels of grain per year, using a Dacron baghouse each for control, exhausting through three (3) stacks; identified as S-1, S-2, and S-3. The three systems are:
 - (1) System 1, using a Dacron baghouse, identified as DS-1, for particulate control, exhausting through a stack, identified as S-1, consists of the following emission units:
 - (A) One (1) truck receiving area, identified as Truck Dump #1, with a maximum hourly capacity of 17,500 bushels per hour;
 - (B) One (1) truck receiving area identified as Truck Dump #2, with a maximum hourly capacity of 17,500 bushels per hour;
 - (C) Grain handling from Bin 12 Upper to Grain Scale, with a maximum hourly capacity of 40,000 bushels per hour; and
 - (D) Grain handling from Grain Scale to Hawk Belt, with a maximum hourly capacity of 40,000 bushels per hour;
 - (2) System 2, using a Dacron baghouse, identified as DS-2 for particulate control, exhausting through a stack, identified as S-2, consists of the following emission units:

- (A) Grain handling from Drag Conveyor DC-1 to Leg 1, with a maximum hourly capacity of 20,000 bushels per hour;
 - (B) Grain handling from Drag Conveyor DC-2 to Leg 2 with a maximum hourly capacity of 20,000 bushels per hour;
 - (C) Grain handling from Rail DC to Legs 3 and 4, with a maximum hourly capacity of 17,500 bushels per hour;
 - (D) Grain handling from Bins to Reclaim Conveyors and Spouts, with a maximum hourly capacity of 17,500 bushels per hour; and
 - (E) Grain handling from Reclaim Conveyors to Grain Legs, with a maximum hourly capacity of 17,500 bushels per hour;
- (3) System 3, using a Dacron baghouse, identified as DS-3, for particulate control, exhausting through a stack identified as S-3, consists of the following emission units:
- (A) Grain handling from Grain Legs to Dual Distributor, with a maximum hourly capacity of 17,500 bushels per hour;
 - (B) Grain handling from Dual Distributor to Tripper or Spouts, with a maximum hourly capacity of 17,500 bushels per hour;
 - (C) Grain handling from Tripper or Spouts to Bins, with a maximum hourly capacity of 17,500 bushels per hour;
 - (D) Grain handling from Legs 3 and 4 to Rail Tank, with a maximum hourly capacity of 17,500 bushels per hour;
 - (E) Grain handling from Rail Shed loadout, with a maximum hourly capacity of 17,500 bushels per hour; and
 - (F) Grain handling from Grain Legs to Dryers, with a maximum hourly capacity of 17,500 bushels per hour;
- (b) Four (4) fugitive emission points from the Truck Dump, Rail Dump, Rail Loadout, and Barge Loadout, identified as FS-1, FS-2, FS-3, and FS-4, respectively.
- (c) Two (2) grain dryers, identified as emission unit ID 4 and 5, one with a maximum capacity of 4,000 bushels per hour and the other with a capacity of 3,000 bushels per hour, heated by natural gas, with a heat input rate of thirty six (36) million Btu (MMBtu) per hour, exhausting through one (1) stack each, identified as S-4 and S-5, respectively.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;

- (b) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;
- (c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (d) Paved and unpaved roads and parking lots with public access;
- (e) Underground conveyors;
- (f) On-site fire and emergency response training approved by the department; and
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) 65-11-93-0222, issued on 5/4/93;
- (b) 65-11-93-021, issued on 5/1/93;
- (c) CP-129-6246, issued on 9/26/96; and
- (d) CP-129-5005, issued on 4/29/96.

All conditions from previous approvals were incorporated into this FESOP.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the Dacron baghouse be considered as an integral part in each of the grain elevator systems.

- (a) The control device is hard-wired to the process such that the control device is activated when the process is activated.
- (b) The control devices are in place to meet OSHA requirements.
- (c) The control devices are used for capturing the product marketed by the facility.
- (d) The control devices allow compliance with the particulate process weight rate limits and opacity limitations.
- (e) Ag Producer Services will maintain proper operation of control device.

IDEM, OAQ has evaluated the justifications and determined that the Dacron baghouse will not be considered as an integral part of the grain elevator systems. This decision is based upon the fact that a hard-wired device can be disconnected at anytime and because OSHA rules can be changed at anytime. The source did not provide information supporting whether a significant amount of product is captured by the baghouses to warrant deeming the baghouses as integral to a process. Therefore, the permitting level will be determined using the potential to emit before the Dacron baghouse.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on July 19, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 8).

Potential To Emit for the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

The source has chosen to limit the grain elevators to forty million (40,000,000) bushels of grain per 12-month period, based on a monthly rolling total. This will limit the PM10 emissions to less than 100 tons per year which will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. Because the maximum process rate is difficult to determine, the potential to emit for the source below were estimated based on this limit.

Pollutant	Potential To Emit (tons/year)
PM	560.39
PM-10	298.60
SO ₂	0.18
VOC	1.74
CO	31.54
NO _x	26.5

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Benzene	6.62x10 ⁻⁴
Dichlorobenzene	3.78 x 10 ⁻⁴
Formaldehyde	2.37 x10 ⁻²
Hexane	5.68 x 10 ⁻¹
Toluene	1.07x10 ⁻³
Lead	1.58x10 ⁻⁴

HAPs	Potential To Emit (tons/year)
Cadmium	3.47x10 ⁻⁴
Chromium	4.42x10 ⁻⁴
Manganese	1.20x10 ⁻⁴
Nickel	6.62x10 ⁻⁴
TOTAL	5.96x10 ⁻¹

- (a) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Group 001 Processes							
Truck Dump #1	0.089	0.02	0	0	0	0	0
Truck Dump #2	0.089	0.02	0	0	0	0	0
Bin 12 Upper to Grain Scale	0.31	0.17	0	0	0	0	0
Grain Scale to Hawk Belt	0.31	0.17	0	0	0	0	0
Group 002 Processes							
DC1 to Leg 1	0.16	0.087	0	0	0	0	0
DC2 to Leg 2	0.16	0.087	0	0	0	0	0
Rail DC to Legs 3 and 4	0.035	0.019	0	0	0	0	0
Bins to Reclaim Conveyors and Spouts	0.69	0.39	0	0	0	0	0
Reclaim Conveyors to Grain Legs	0.69	0.39	0	0	0	0	0
Group 003 Processes							
Grain Legs to Dual Distributor	0.69	0.39	0	0	0	0	0
Dual Distributor to Tripper	0.69	0.39	0	0	0	0	0
Tripper or Spouts to Bins	0.69	0.39	0	0	0	0	0

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Legs 3 and 4 to Rail Tank	0.035	0.019	0	0	0	0	0
Rail Shed Loadout	0.15	0.12	0	0	0	0	0
Grain Legs to Dryers	0.35	0.19	0	0	0	0	0
Dryers							
Meyer Dryer	23.83	7.42	0.09	0.87	13.25	15.77	0
Berico Dryer	23.83	7.42	0.09	0.87	13.25	15.77	0
Total	52.80	17.69	0.18	1.74	26.5	31.54	0

County Attainment Status

The source is located in Posey County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Posey County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) applicable to this source. Truck Dump #1, Truck Dump #2, and Barge Loading are not subject to the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60, Subpart DD (Standards of Performance for Grain Elevators) because the source has a maximum storage capacity of 1.8 million bushels which is less than the necessary 2.8 million bushels to be considered a grain terminal elevator. This source is not considered a grain storage elevator as defined in 40 CFR 60.301(f) because it is not associated with any mill or oil extraction plant.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on July 19, 2000.

326 IAC 2-6 (Emission Reporting)

This source is located in Posey County and the potential to emit PM and PM10 is limited to less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-8-4 (FESOP)

The source will limit PM10 emissions to less than 100 tons per year (22.83 lb/ton) through limiting the grain elevators to forty million (40,000,000) bushels of grain per 12-month period, based on a monthly rolling total and by using the baghouses in place at the source. This will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. The source will also be in compliance with this limit by limiting PM10 emissions for receiving units to less than 0.0078 pounds per ton of grain, for shipping, handling, and loadout units to less than 0.034 pounds per ton of grain, for the rail shed loadout to less than 0.22 pounds per ton of grain, and for drying units to less than 0.055 pounds per ton of grain.

326 IAC 2-2 (Prevention of Significant Deterioration)

This source will limit PM emissions to less than 250 tons per year through limiting the grain elevators to forty million (40,000,000) bushels of grain per 12-month period, based on a monthly rolling total and by using the baghouses in place at the source. This limit is equivalent to PM emissions of 0.035 pounds per ton of grain for receiving units, 0.061 pounds per ton of grain for shipping, handling, and loadout units, 0.27 pound per ton of grain for the rail shed loadout, and 0.2 pounds per ton of grain for the drying units. This will render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property, right of way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the receiving, handling, drying, and shipping facilities shall be limited to the potential controlled emissions as reported below:

Process/Facility	Process Weight Rate (bushels/hr)	Process Weight Rate (ton/hr)	Emission Rate (lb/hr)
Group 001 Processes			
Truck Dump #1	17,500	525	69.54
Truck Dump #2	17,500	525	69.54
Bin 12 Upper to Grain Scale	40,000	1,200	79.97
Grain Scale to Hawk Belt	40,000	1,200	79.97

Process/Facility	Process Weight Rate (bushels/hr)	Process Weight Rate (ton/hr)	Emission Rate (lb/hr)
Group 002 Processes			
DC1 to Leg1	20,000	600	71.16
DC2 to Leg 2	20,000	600	71.16
Rail DC to Legs 3 and 4	17,500	525	69.54
Bins to Reclaim Conveyors and Spouts	17,500	525	69.54
Reclaim Conveyors to Grain Legs	17,500	525	69.54
Group 003 Processes			
Grain Legs to Dual Distributor	17,500	525	69.54
Dual Distributor to Tripper	17,500	525	69.54
Tripper or Spouts to Bins	17,500	525	69.54
Legs 3 and 4 to Rail Tank	17,500	525	69.54
Rail Shed Loadout	17,500	525	69.54
Grain Legs to Dryers	17,500	525	69.54
Dryers			
Meyer Dryer	4,000	120	53.13
Berico Dryer	3,000	90	50.23

These limitations were based on the following:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The baghouses shall be in operation at all times these facilities are in operation, in order to comply with this limit.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet

Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The grain elevator systems and grain dryers has applicable compliance monitoring conditions as specified below:
 - (a) Once per shift visible emissions notations of the grain elevator systems and grain dryers shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across the baghouses controlling the grain elevator systems at least once daily when the grain elevator systems are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 2.0 to 10.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouse for the grain elevator systems process must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this wholesale grain processing source shall be subject to the conditions of the attached proposed FESOP No. F129-12502-00001.

Appendix A: Emissions Calculations

Page 1 of 8 TSD App A

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler - Grain Dryer # 1 (S-5)

Company Name: Ag Producer Services, Cargill, Inc.

Address City IN Zip: Uniontown Road, Mt. Vernon, IN 47620

CP: 129-12502-00001

Plt ID: 129-12502-00001

Reviewer: ERG/RGO

Date: 10/30/2000

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

36.000

315.4

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	1.20	1.20	0.09	15.77	0.87	13.25

*PM and PM10 emission factors are combined filterable and condensable PM and PM10 respectively.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

updated 4/99

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler - Grain Dryer # 1 (S-5)****HAPs Emissions****Company Name:** Ag Producer Services, Cargill, Inc.**Address City IN Zip:** Uniontown Road, Mt. Vernon, IN 47620**CP:** 129-12502-00001**Plt ID:** 129-12502-00001**Reviewer:** ERG/RGO**Date:** 10/30/2000**HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.311E-04	1.892E-04	1.183E-02	2.838E-01	5.361E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.884E-05	1.734E-04	2.208E-04	5.992E-05	3.311E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler - Grain Dryer # 2 (S-6)****Company Name:** Ag Producer Services, Cargill, Inc.**Address City IN Zip:** Uniontown Road, Mt. Vernon, IN 47620**CP:** 129-12502-00001**Plt ID:** 129-12502-00001**Reviewer:** ERG/RGO**Date:** 10/30/2000Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

36.000

315.4

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	1.20	1.20	0.09	15.77	0.87	13.25

*PM and PM10 emission factors are combined filterable and condensable PM and PM10 respectively.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

updated 4/99

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler - Grain Dryer # 2 (S-6)****HAPs Emissions**

Company Name: Ag Producer Services, Cargill, Inc.
Address City IN Zip: Uniontown Road, Mt. Vernon, IN 47620
CP: 129-12502-00001
Plt ID: 129-12502-00001
Reviewer: ERG/RGO
Date: 10/30/2000

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.311E-04	1.892E-04	1.183E-02	2.838E-01	5.361E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.884E-05	1.734E-04	2.208E-04	5.992E-05	3.311E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Grain Elevator

Small Country Terminal Elevator (Group 001 Processes)

Company Name: Ag Producer Services, Cargill, Inc.

Address City IN Zip: Uniontown Road, Mt. Vernon, IN 47620

CP: 129-12502-00001

Plt ID: 129-12502-00001

Reviewer: ERG/RGO

Date: 10/30/2000

ACTUAL HOURS OF OPERATION	
Hours per day:	24
Days per week:	7
Weeks per year:	52
HOURS PER YEAR:	8760

Limited Potential Scenario	Proposed	% Contribution
Truck Dump#1	18,000,000	45%
Truck Dump#2	18,000,000	45%
Rail	4,000,000	10%
	40,000,000	

BUSHEL PER YEAR	Actual	% Cont	Limited Potential (bushels)	Conversion	Limited Potential (tons)
Corn:	13,700,000	58.472%	23,388,818	56	654,887
Bean:	6,400,000	27.315%	10,926,163	56	305,933
Wheat:	2,850,000	12.164%	4,865,557	60	145,967
Milo:	480,000	2.049%	819,462	60	24,584
Total	23,430,000	100%	40,000,000		1,131,370

Group001 Emission Process	Emission Process	Processing Rate (tpy)	Processing Rate (pound per hour)	PM Emission Factor	PM Emissions (tpy)	PM10 Emission Factor	PM10 Emissions (tpy)	Control Efficiency (%)	Controlled PM Emissions (tpy)	PM-10 Emissions (tpy)
Truck Dump #1	Receiving	509,117	116,237	0.035	8.910	0.0078	1.986	99.00%	0.089	0.020
Truck Dump #2	Receiving	509,117	116,237	0.035	8.910	0.0078	1.986	99.00%	0.089	0.020
Bin 12 Upper to grain s	Shipping	1,018,233	232,473	0.061	31.056	0.034	17.310	99.00%	0.311	0.173
Grain scale to hawk b	Shipping	1,018,233	232,473	0.061	31.056	0.034	17.310	99.00%	0.311	0.173
	TOTAL =				79.931		38.591		0.799	0.386

Methodology

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Uncontrolled Grain

Elevators (5th Edition Supplement 1998)

Actual throughput of 23 million bushels in a year were scaled to the maximum of 40 million bushels

Potential Emissions in ton/yr = Processing Rate * Emission Factor / 2000 (lbs/ton)

AP 42 9.9.1-1 - Country elevators are generally smaller elevators that receive grain by truck directly from farms during harvest

season. Terminal elevators dry, clean, blend and store grain for shipment to other terminals or processors, or for export.

These elevators may receive grain by truck, rail, or barge, and generally have greater grain handling and storage capacities than country elevators.

Grain Elevator

Small Country Terminal Elevator (Group002 Processes)

Company Name: Ag Producer Services, Cargill, Inc.

Address City IN Zip: Uniontown Road, Mt. Vernon, IN 47620

CP: 129-12502-00001

Plt ID: 129-12502-00001

Reviewer: ERG/RGO

Date: 10/30/2000

ACTUAL HOURS OF OPERATION	
Hours per day:	24
Days per week:	7
Weeks per year:	52
HOURS PER YEAR:	8760

Limited Potential Scenario	Proposed	% Contribution
Truck Dump#1	18,000,000	45%
Truck Dump#2	18,000,000	45%
Rail	4,000,000	10%
	40,000,000	

BUSHEL PER YEAR	Actual	% Cont	Limited Potential (bushels)	Conversion	Limited Potential (tons)
Corn:	13,700,000	58.472%	23,388,818	56	654,887
Bean:	6,400,000	27.315%	10,926,163	56	305,933
Wheat:	2,850,000	12.164%	4,865,557	60	145,967
Milo:	480,000	2.049%	819,462	60	24,584
Total	23,430,000	100%	40,000,000		1,131,370

Group002 Emission Process	Emission Process	Processing Rate (tpy)	Processing Rate (pound per hour)	PM Emission Factor	PM Emissions (tpy)	PM10 Emission Factor	PM10 Emissions (tpy)	Control Efficiency (%)	Controlled PM Emissions (tpy)	PM-10 Emissions (tpy)
DC1 to Leg 1	Handling	509,117	116,237	0.061	15.528	0.034	8.655	99.00%	0.155	0.087
DC2 to Leg 2	Handling	509,117	116,237	0.061	15.528	0.034	8.655	99.00%	0.155	0.087
Rail DC to Legs 3 and 4	Handling	113,137	25,830	0.061	3.451	0.034	1.923	99.00%	0.035	0.019
Bins to Reclaim Conveyors	Handling	2,262,740	516,607	0.061	69.014	0.034	38.467	99.00%	0.690	0.385
Reclaim Conveyors to Leg 1	Loadout	2,262,740	516,607	0.061	69.014	0.034	38.467	99.00%	0.690	0.385
	TOTAL =				172.534		96.166		1.725	0.962

Methodology

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Uncontrolled Grain Elevators (5th Edition Supplement 1998)

Actual throughput of 23 million bushels in a year were scaled to the maximum of 40 million bushels

Potential Emissions in ton/yr = Processing Rate * Emission Factor / 2000 (lbs/ton)

AP 42 9.9.1-1 - Country elevators are generally smaller elevators that receive grain by truck directly from farms during harvest

season. Terminal elevators dry, clean, blend and store grain for shipment to other terminals or processors, or for export.

These elevators may receive grain by truck, rail, or barge, and generally have greater grain handling and storage capacities than country elevators.

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Grain Elevator

Small Country Terminal Elevator (Group003 Processes)

Company Name: Ag Producer Services, Cargill, Inc.

Address City IN Zip: Uniontown Road, Mt. Vernon, IN 47620

CP: 129-12502-00001

Plt ID: 129-12502-00001

Reviewer: ERG/RGO

Date: 10/30/2000

ACTUAL HOURS OF OPERATION	
Hours per day:	24
Days per week:	7
Weeks per year:	52
HOURS PER YEAR:	8760

Limited Potential Scenario	Proposed	% Contribution
Truck Dump#1	18,000,000	45%
Truck Dump#2	18,000,000	45%
Rail	4,000,000	10%
	40,000,000	

BUSHEL PER YEAR	Actual	% Cont	Limited Potential (bushels)	Conversion	Limited Potential (tons)
Corn:	13,700,000	58.472%	23,388,818	56	654,887
Bean:	6,400,000	27.315%	10,926,163	56	305,933
Wheat:	2,850,000	12.164%	4,865,557	60	145,967
Milo:	480,000	2.049%	819,462	60	24,584
Total	23,430,000	100%	40,000,000		1,131,370

Group003 Emission Point	Emission Process	Processing Rate (tpy)	Processing Rate (pound per hour)	PM Emission Factor	PM Emissions (tpy)	PM10 Emission Factor	PM10 Emissions (tpy)	Control Efficiency (%)	PM Emissions (tpy)	PM-10 Emissions (tpy)
Grain Legs to Dual Distributor	Handling	2,262,740	516,607	0.061	69.014	0.034	38.467	99.00%	0.690	0.385
Dual Distributor to Tripper	Handling	2,262,740	516,607	0.061	69.014	0.034	38.467	99.00%	0.690	0.385
Tripper or Spouts to Bins	Handling	2,262,740	516,607	0.061	69.014	0.034	38.467	99.00%	0.690	0.385
Legs 3 and 4 to Rail Tarp	Handling	113,137	25,830	0.061	3.451	0.034	1.923	99.00%	0.035	0.019
Rail Shed Loadout	Loadout	113,137	25,830	0.27	15.273	0.22	12.445	99.00%	0.153	0.124
Grain Legs to Dryers	Handling	1,131,370	258,304	0.061	34.507	0.034	19.233	99.00%	0.345	0.192
	TOTAL =				260.272		149.001		2.603	1.490

Methodology

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Uncontrolled Grain Elevators (5th Edition Supplement 1998)

Actual throughput of 23 million bushels in a year were scaled to the maximum of 40 million bushels

Potential Emissions in ton/yr = Processing Rate * Emission Factor / 2000 (lbs/ton)

AP 42 9.9.1-1 - Country elevators are generally smaller elevators that receive grain by truck directly from farms during harvest

season. Terminal elevators dry, clean, blend and store grain for shipment to other terminals or processors, or for export.

These elevators may receive grain by truck, rail, or barge, and generally have greater grain handling and storage capacities than country elevators.

granele3.9/00

Grain Elevator

Small Country Terminal Elevator (Dryer Emissions)

Company Name: Ag Producer Services, Cargill, Inc.

Address City IN Zip: Uniontown Road, Mt. Vernon, IN 47620

CP: 129-12502-00001

Plt ID: 129-12502-00001

Reviewer: ERG/RGO

Date: 10/30/2000

ACTUAL HOURS OF OPERATION	
Hours per day:	24
Days per week:	7
Weeks per year:	52
HOURS PER YEAR:	8760

Limited Potential Scenario	Proposed	% Contribution
Truck Dump#1	18,000,000	45%
Truck Dump#2	18,000,000	45%
Rail	4,000,000	10%
	40,000,000	

BUSHEL PER YEAR	Actual	% Cont	Limited Potential (bushels)	Conversion	Limited Potential (tons)
Corn:	13,700,000	58.472%	23,388,818	56	654,887
Bean:	6,400,000	27.315%	10,926,163	56	305,933
Wheat:	2,850,000	12.164%	4,865,557	60	145,967
Milo:	480,000	2.049%	819,462	60	24,584
Total	23,430,000	100%	40,000,000		1,131,370

Dryer Emission Point	Emission Process	Processing Rate (tpy)	Processing Rate (pound per hour)	PM Emission Factor	PM Emissions (tpy)	PM10 Emission Factor	PM10 Emissions (tpy)
Meyer Dryer	Drying	226,274	51,661	0.2	22.627	0.055	6.223
Berico Dryer	Drying	226,274	51,661	0.2	22.627	0.055	6.223
	TOTAL =				45.255		12.445

Methodology

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Uncontrolled Grain Elevators (5th Edition Supplement 1998)

Actual throughput of 23 million bushels in a year were scaled to the maximum of 40 million bushels

Potential Emissions in ton/yr = Processing Rate * Emission Factor / 2000 (lbs/ton)

AP 42 9.9.1-1 - Country elevators are generally smaller elevators that receive grain by truck directly from farms during harvest season. Terminal elevators dry, clean, blend and store grain for shipment to other terminals or processors, or for export.

These elevators may receive grain by truck, rail, or barge, and generally have greater grain handling and storage capacities than country elevators.